

From: [Boparai, Poonam](#)
To: [Gungle, Ashley](#)
Subject: RE: TDS Solar
Date: Thursday, July 12, 2012 1:57:55 PM
Attachments: [3600-12-005 Specialist Checklist - Air Quality.xls](#)

Here you go, Ashley. Let me know if you have questions.

-Poonam

From: Gungle, Ashley
Sent: Thursday, July 12, 2012 11:27 AM
To: Boparai, Poonam
Subject: RE: TDS Solar

[Awesome, thanks!](#)

From: Boparai, Poonam
Sent: Thursday, July 12, 2012 11:26 AM
To: Gungle, Ashley
Subject: RE: TDS Solar

Hi Ashley,

Great timing! I'm typing them up right now. Will send shortly.

Thanks,
-Poonam

From: Gungle, Ashley
Sent: Thursday, July 12, 2012 11:19 AM
To: Boparai, Poonam
Subject: TDS Solar

Hi Poonam,

I just wanted to check in on the status of your comments for REZ12-005/P12-010.

If they're completed, can you please send me a copy? I can upload them into documentum if needed.

Thanks!

Ashley

ATTACHMENT A
PROJECT ISSUE CHECKLIST

DPLU (Department of Planning and Land Use) Planning and CEQA Comments					
Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified
	1	Air Quality	Executive Summary - This section should include all project design measures and proposed mitigation (if applicable), consistent with DPLU <i>Guidelines for Determining Significance and Report Format and Content Requirements</i> . Please revise.		7/12/2012
	2	Air Quality	Executive Summary - Please include a summary of all project impacts including impacts to sensitive receptors, odor impacts, and cumulative impacts in this section.		7/12/2012
	3	Air Quality	Section 1.2 - Project grading would include approximately 694,450 cubic yards of balanced cut and fill. Fugitive dust emissions for the project reported in the Study do not account for any cut/fill volumes. Emissions are only based on site disturbance acreage. Emissions must be estimated based on this additional level of detail and reported in the Study. The project description should also be updated with this information.		
	4	Air Quality	Section 1.2 - The Project Description provided by the Applicant states that the project requires a 138 kV private transmission line (Gen-Tie) to interconnect into the Boulevard Substation. Tables in Appendix A show the emissions for various construction activities. However, a phase addressing the construction of the Gen-Tie line is not included. The analysis needs to address the regional and localized impacts of this activity on offsite sensitive receptors. The Project Description also states that helicopters may be used to deliver equipment, position poles and structures, string lines, and position aerial markers, as required by Federal Aviation Administration (FAA) regulations for project operations and maintenance. This source of emissions also needs to be addressed in the Study. Please update the Study with these analyses.		7/12/2012
	5	Air Quality	Section 1.2 - Please identify the source for the water anticipated to be used during construction and operational activities. If water will be obtained from an offsite location, the transport of water (if by trucks) needs to be included in the emissions estimates.		7/12/2012

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6	Air Quality	Section 1.2 - Please identify all project design features that would be incorporated to reduce fugitive dust emissions during construction and operations.	7/12/2012
7	Air Quality	Section 2.1 - This section should identify existing onsite uses, if any, surrounding land uses (including sensitive receptors in the project vicinity), and topography of the site consistent with County Report Format and Content Requirements. It should be stated if the existing structures onsite would be demolished as part of the project.	7/12/2012
8	Air Quality	Section 2.2 - The San Diego Air Basin is designated as a maintenance area for the federal CO standard. Please include this designation in the section.	7/12/2012
9	Air Quality	Section 2.2 - Please include a summary of microscale meteorological conditions including temperature, precipitation, and prevailing wind patterns in the project area, consistent with County guidance.	7/12/2012
10	Air Quality	Section 2.3.3 - The "SDAPCD 1969" reference for Rule 51 is missing from the references list in Section 6.0. Please update.	7/12/2012
11	Air Quality	Section 2.3.3 - Please specify that County Code Section 87.428 is part of the San Diego County Grading, Clearing and Watercourses Ordinance.	7/12/2012
12	Air Quality	Section 2.4.1 - Please include a brief discussion of diesel particulate matter under the "Toxic Air Contaminants" section.	7/12/2012
13	Air Quality	Section 2.4.3 and Table 3 - Ambient air quality monitoring data is available for the year 2011. Please update table contents to reflect most recent available data.	7/12/2012
14	Air Quality	Section 3.0, Table 5 - San Diego County's threshold of significance for VOCs is 75 lb/day based on the Guidelines for Determining Significance, not 137 lb/day as reported in the table. Please update the table, the source cited, and analysis to use the correct threshold.	7/12/2012
15	Air Quality	Section 4.1.2 - This section states that consistency of a project with the RAQS is analyzed by assessing its consistency with the County's General Plan. However, this analysis not provided in the section. Please identify the site designation in the General Plan and describe how the project is consistent with the same, in addition to the growth analysis provided.	7/12/2012

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16	Air Quality	Section 4.2.1.2 - Please describe why two different versions of the Off-Road model were used in the analysis. If the 2011 version was used to update certain parameters in the 2007 version, this needs to be explained in the Study.		7/12/2012
17	Air Quality	Section 4.2.1.2 - Please see previous comment regarding the soil cut/fill operations. The section states that fugitive dust emissions were estimated based on a daily disturbed area of 10 acres. The project would involve a balanced cut/fill operation of 694,450 cubic yards. Fugitive dust emissions from cut and fill operations are different than surface disturbance due to the excavation and movement of soil involved. The Study needs to estimate fugitive dust emissions based on the cubic yards of soil handling.		7/12/2012
18	Air Quality	Section 4.2.1.2 - The section states that dust emissions from vehicle travel on paved roads were estimated based on Section 13.2.1 of AP-42. However, no mention is made of such emissions from vehicle travel on unpaved roads. Please include emissions from vehicle travel on unpaved roads onsite and for any unpaved access roads. The emissions calculations for paved roads are shown in Appendix A. However, the VMT value used to estimate these emissions is not disclosed. Please provide complete calculations data to allow for review.		7/12/2012
19	Air Quality	Section 4.2.1.2 - This section needs to include assumptions used for analyzing truck trips during construction, including truck trips to transport project materials (solar panels etc.). Tables in Appendix A show certain trips distances for each types of trip with footnote references. However, footnotes are not included in the tables to support the use of a certain trip distance. Please update both the Appendix and text of the Study.		7/12/2012
20	Air Quality	Tables 6 and 7 - Please update the VOC threshold based on previous comments.		7/12/2012
21	Air Quality	Section 4.2.1.3 - Please include the frequency of soil binding agent application in the design consideration.		7/12/2012
22	Air Quality	Section 4.2.2.2 - Please provide the trips distances used for operations and maintenance vehicle trips along with any assumptions used to arrive at the numbers.		7/12/2012

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23	Air Quality	Section 4.2.2 - This section does not address the potential for fugitive dust emissions from long-term operation of the project. Please include a discussion of these emissions along with standard County-recommended measures to control dust after construction is complete.		7/12/2012
24	Air Quality	Section 4.3.1.2 - This section needs to identify other projects in the cumulative area that are mentioned to address the impacts, along with approximate distances from the proposed project. A discussion of cumulative impacts related to exhaust emissions of pollutants other than PM10 and PM2.5 also needs to be included in the section.		7/12/2012
25	Air Quality	Section 4.3.2 - The section relies on the project's conformance with the County General Plan to conclude that operational emissions are not cumulatively considerable. However, as stated in a previous comment, no such analysis is provided. Please update.		7/12/2012
26	Air Quality	Section 4.4.1 - The discussion of health risk impacts from construction-related diesel PM does not demonstrate that the project would not exceed the County's threshold of 1 in 1 million for incremental cancer risk without application of T-BACT. While exposure durations related to construction are limited, it is possible for sensitive receptors to be exposed to risks in excess of this threshold during periods of intense construction activity, especially since the nearest receptor is directly adjacent to the project site. It is recommended that a screening-level health risk assessment be conducted to determine if application of T-BACT is required for the project, consistent with other projects of similar nature and magnitude.		7/12/2012
27	Air Quality	Section 5.2.2 - SF6 is typically used to provide insulation to various substation components. The section states that the project does not include any equipment that uses SF6. Please describe how insulation would be provided at the substation to support the conclusion that no SF6 will be used.		7/12/2012
28	Air Quality	Please include a Section 6.0 to provide "Summary of Recommended Project Design Features, Impacts, and Mitigation Measures" consistent with County Report Format and Content Requirements.		7/12/2012